

ARIZONA DEPARTMENT OF TRANSPORTATION TRANSPORTATION PLANNING DIVISION

REVIEW COMMENTS

SUBMITTAL:	Working Paper 1	PROJECT NAME:	I-19 Frontage Roads
REPORT DATE:		PROJECT NO:	
REVIEWED BY:		ADOT TRACS NO. ROUTE NO. MILE POST NO.	
DISCIPLINE/ OFFICE:		DESIGNER/ CONSULTANT:	Kimley-Horn

ACTION CODES:

A= WILL COMPLY

***B= CONSULTANT/DESIGNER TO EVALUATE**

***C= ADOT TEAM TO EVALUATE**

***D= DESIGN TEAM RECOMMENDS NO FURTHER**

ACTION

*** REQUIRES A WRITTEN EXPLANATION AND FINAL DISPOSITION BY CONSULTANT/DESIGNER**

ITEM NO.	DWG, SHT, PAGE NO.	COMMENT	DISPOSITION	
			INIT.	FINAL
		<i>Jonathan Crowe, Pima County Department of Transportation</i>		
1	Exhibit 1-2, General	I'll try to go through the whole report, but for one, please delete "Duval Mine Waterline Road" from the Study Area exhibit 1-2 and anywhere else this road is mentioned throughout the report. Despite being shown on our Major Streets and Scenic Routes Plan, this is not a road. You may want to name other cross streets that intersect the frontage road system between Continental Road and Canoa Road, such as Calle Tres, Camino Encanto, and Mission Twin Buttes. <i>Response: Will comply</i>	A	
2	35	On page 35 of the report, Section 3.8.2 Pima County Rural Transit, update the last sentence to "In 2006-07 Pima County Rural Transit provided 104,326 passenger trips". <i>Response : This statement was added to the text.</i>	A	
1	Section 3.9	Describe qualitatively the lack of bike facilities/paved shoulders, except a couple short sections such as the recently reconstructed west side frontage road south of Continental <i>Response: See response to comment below.</i>	A	

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	Section 3.9	<p>Provide any quantitative information, if available</p> <p><i>Response: Will add the following information:</i> <i>"Paved shoulders are not provided along the vast majority of the frontage road system. Based on field observations, usable paved shoulders (greater than one foot of pavement beyond the lane line) are limited to the following locations:</i></p> <p><i>West Frontage Road</i></p> <ul style="list-style-type: none"> ▪ <i>Approximately 4-foot shoulders (both sides) south of Continental Road.</i> ▪ <i>Approximately 8-foot shoulders (both sides) south of Arivaca Road</i> ▪ <i>Approximately 6- to 7-foot shoulders (both sides) north of Rio Rico Drive</i> <p><i>East Frontage Road</i></p> <ul style="list-style-type: none"> ▪ <i>Approximately 8-foot shoulders (both sides) south of Arivaca Road</i> ▪ <i>Approximately 8-foot shoulders (both sides) south of Tubac Road</i> ▪ <i>Approximately 6-foot shoulder (northbound) and 2-foot shoulder (southbound) north of Ruby Road</i> ▪ <i>Approximately 6-foot shoulder (northbound) and 2-foot shoulder (southbound) south of Ruby Road"</i> 	A
	Section 3.9	<p>Shoulders of at least 4' wide are planned with the Pima County project from Continental to Canoa, east side</p> <p><i>Response: This has been added to the text.</i></p>	A
	Section 3.9	<p>ADOT doesn't typically use "Share the Road" signs on frontage roads - should policy be reconsidered?</p> <p><i>Response: Will note this in Working Paper 1. Policy recommendations are provided in Working Paper 2.</i></p>	A
	Section 3.9	<p>Clarify ownership and maintenance of frontage road system (county/state)</p> <p><i>Response: Will add text to a new section 3.10, Maintenance: The maintenance of the frontage roads is currently the responsibility of the Arizona Department of Transportation, Tucson District, with the exception of the following segments:</i></p> <ul style="list-style-type: none"> ▪ <i>The West I-19 Frontage Road between Rio Rico Road and Peck Canyon Road is the responsibility of Santa Cruz County, not ADOT.</i> ▪ <i>A segment of the East Frontage Road, north of the Duval Mine Road TI (ADOT maintains the frontage road to approximately 0.10 mile north of the interchange, and the Town of Sahuarita maintains it further north beyond that point).</i> 	A
	Section 3.9	<p>Planned Canoa roundabouts on east and west side frontage roads and effects on cyclists</p> <p><i>Response: The Design Concept Report for this area has not been finalized. The construction of roundabouts was included in the report. This study will reference the recommendations from the Design Concept Report.</i></p>	A
	Section 3.9	<p>Green Valley Bike and Trails Plan recommendations (info from Bill Adamson)</p> <p><i>Response: A summary of frontage road recommendations was added to the text, it is also included in Working Paper 2</i></p>	A

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	Section 3.9	Recommend paved shoulders, probably most needed from Continental to Canoa Road <i>Response: Shoulder improvements will be an integral part of the recommendations. Policies will be discussed in Working Paper 2. Recommendations will be provided in Working Paper 3.</i>	B
	Section 3.9	Inventory cross-street bike facilities under I-19 connecting both frontage road systems (this doesn't appear to be part of your scope but is an important element of the overall analysis). <i>Response: This is beyond our scope of work.</i>	D
	Section 3.9	Continental Road bike lane project (transportation enhancement) in design by Pima County - probably should be listed under plans. <i>Response: KHA provided a description of this project in Section 2.1.12</i>	A
	Section 3.9	Esperanza Road bike lane project (transportation enhancement) - Pima County seeking funding. <i>Response: A description of this proposed project is provided in Section 3.9</i>	A
	Section 3.9	Bicycle detection by traffic signals - does it exist? <i>Response: Based on a discussion with a representative from ADOT Tucson District-Regional Traffic Operations, there is no bicycle detection on any of the traffic signals serving the I-19 frontage roads.</i>	A
	Section 3.9	Shoulder reconstructions in the vicinity of Mariposa and Ruby Road in Santa Cruz Road. <i>Response: This is discussed in Section 3.1.9 ADOT, I-19 West Frontage Road, Country Club Road to Ruby Road, Final Project Assessment</i>	A
	Section 3.9	Are there any pedestrian facilities (sidewalks) or crossing pedestrian facilities (trails, paths, sidewalks)? <i>Response: The project limits are limited to the frontage roads, rather than the cross street connections.</i>	D
		<i>Mark Pugh, Tohono O'odham San Xavier District</i>	
1	2	The San Xavier District of the Tohono O'odham Nation appreciated the opportunity to review the ADOT Frontage Roads Study- Working Paper No.1 (Existing & Future Conditions). After reviewing the entire report, and specifically page 2, Section 1.3 "Purpose of Working Paper No.1, am I to expect Working Paper No.2 or later papers will address new proposed frontage road segments? I appreciate that clarification. <i>Response: Working Paper 3 will focus on development of a 10 year plan of improvements for the frontage roads.</i>	A

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2	11-12	<p>Page 11-12: PAG 2020 Regional Transportation Plan You state "The PAG 2030 Regional Transportation Plan identifies improvements to I-19 frontage roads, as summarized in the table below. In addition, several interchange reconstruction projects are planned at the I-19 / Canoa traffic interchange, the I-19 / Irvington Road interchange, the I-19 / Pima Mine Road Interchange..."</p> <p>In addition, in the table, it's listed under the Implementation Years as a "Medium Period" project. The San Xavier District is pleased to see the Pima Mine Road Interchange listed under the PAG 2030 Regional Transportation Plan.</p> <p>Could you provide me some details on how having this intersection in PAG 2030 Regional Transportation Plan will assist the project in the short or long term? Or what things the San Xavier District can do in the future to assist in this process?</p> <p><i>Response: Frontage roads are not currently in this location, however, should this project be advanced, frontage roads are a consideration.</i></p>		
3	66	<p>Page 66: Section 4.2.10 Cultural Resources After reading this section, and reviewing Appendix C, it was unclear to me if in fact any Cultural Resource sites on the San Xavier District were mentioned, or due to the sensitive nature of this information, it was left off intentionally. In any event, it should be stated in this or subsequent working papers, that if any frontage roads are proposed on the San Xavier District (a few positive idea's did come up at our joint meeting here at the San Xavier District) that Cultural Resources would in fact have to be taken into account on these roads. At that point we would involve our Nation's Cultural Affairs Department for guidance on this matter.</p> <p><i>Response: The cultural resource review was conducted within a one-mile buffer of the I-19 frontage road right-of-way. KHA added the statement to this section "If any frontage roads are proposed on the Tohono O'odham San Xavier District, the Tohono O'odham Nation's Cultural Affairs Department would need to be consulted for guidance."</i></p>	A	
		<i>Bill Adamson comments</i>		
1	1	<p>Para 1.2 Study Area, p. 1: What is the distance away from the interstate that is considered to be included in the study area?</p> <p><i>Response: The study boundaries included the frontage roads only, and the immediate right of way for the frontage roads. Environmental reviews were conducted within a one mile buffer of the frontage roads, however.</i></p>	A	
2	Exhibit 1-2	<p>Exhibit 1-2 Study Area: "Dual Mine Rd" is really "Calle Tres" in Green Valley.</p> <p><i>Response: We will revise this on the maps in this working paper.</i></p>	A	

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3	9	<p>Para. 2.1.6, Pima County I-19 East Frontage Rd DCR, Canoa Ranch Dr to Continental Rd, p. 9:</p> <p>"Status" should clarify that the paved shoulders are planned to be 4ft wide which will accommodate bicyclists but not golf carts. This is a major disruption to multi-modal transportation widely used in Green Valley. I-19 divides the town and golf carts will not be able to cross the interstate at the Canoa Interchange, but they would be able to, if the paved shoulders were 6ft wide as they are through out most of Green Valley.</p> <p><i>Response: We will add this to the text</i></p>	A
4	11	<p>Para 2.2.2, PAG 5 year draft TIP, p. 11:</p> <p>It should be recognized that the SPUI type interchange design presents many challenges to the safety of bicyclists/pedestrians that need to be considered in the design.</p> <p><i>Response: Since this section is merely a project listing, we will add this issue to stakeholder comments in Working Paper 2.</i></p>	A
5	13	<p>Para 2.4, Summary -----Traffic-----Studies, p. 13:</p> <p>La Mesas and Sopori Ranch change to the Comprehensive Plan was approved last week.</p> <p>There are many new developments being proposed in Green Valley that will have their only entrance on the WFR. This will cause great impact on the existing road (see attached Santa Cruz Valley Bicycle Advocate letter, subject: GVCCC Resolution of 4/20/06 re: West Frontage Rd, dated, May 12, 2006).</p> <p>Other new developments proposed for the Green Valley region are Mission Peaks on Mission Rd, developments at the gateway to Madera Canyon, and of course continued growth in the Town of Sahuarita.</p> <p><i>Response: Working Paper 1 will be updated with this information. It was our understanding that the Mission Peaks project has been withdrawn recently.</i></p>	A
6	22	<p>Exhibit 3-3, Characteristics of EFR, p. 22:</p> <p>Segment 9 has some significant length of paved shoulders that could be used for bicyclists, but they have been left to go to waste. Clearing of vegetation and smoothing the shoulders could be a fast and inexpensive way to add bike facilities in this high traffic area.</p> <p><i>Response: Added the following to Exhibit 3-3:</i></p> <p><i>"Segment 9 has some significant length of paved shoulders that could be used for bicyclists. Clearing of vegetation and smoothing the shoulders would provide bike facilities in this area."</i></p>	A
7	1	<p>Para. 1.1 Study Purpose, p. 1:</p> <p>Third bullet: The ADOT policies being assessed should also include policies relating to safety of all users of the road including motorists, bicyclists, golf carts, and pedestrians where applicable. Safe facilities and signage are needed.</p> <p><i>Response: We will address this in the policies being developed for Working Paper 2.</i></p>	A

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8	26	<p>Para 3.3, Traffic Volume Data, p.26: Data collected in September is always low due to the large number of snow birds in Green Valley and Tubac. Pima County can probably provide some guidance as to how much these traffic volumes should be increased to reflect maximum levels.</p> <p><i>Response: We recognize that September represents is an average month for traffic volumes (not as low as summer months, but not as high as winter months).</i></p>		
9	28	<p>Para 3.5, Access Management, p.28:</p> <p>Pima County approves new subdivisions that have their only access from the frontage roads. This greatly increases congestion.</p> <p>There is an exception to the statement, "Areas with a supporting alternate road system are the Green Valley area and -----". The EFR south of Calle Torres Blancas, and the new developments proposed off the WFR south of the Canoa Interchange do not have alternative roads to the frontage roads.</p> <p><i>Response: That sentence was corrected to read: "Areas with a supporting alternate road system are the Green Valley area (with exception of the East Frontage Road south of Calle Torres Blancas) and between Peck Canyon Road and Rio Rico Road area. Other areas have limited or no supporting road systems. "</i></p> <p><i>We did not include a reference to the proposed development in this section, as it deals with currently existing access.</i></p>	A	
10	38	<p>Para 3.10, Neighborhood Electric Vehicles, p. 38: Mike Sanders, ADOT, also found legislation about gas powered golf carts that had no mention of speed restrictions. I can not find the reference that Mike had sent me, but maybe he could provide it again.</p> <p><i>Response: KHA included both of the Arizona Revised Statutes that referenced golf carts and neighborhood electric vehicles.</i></p>	A	

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11	65	<p>Para 4.2.8, 4(f) Resources, p. 65: I don't know if the following should be addressed here or elsewhere:</p> <ul style="list-style-type: none"> • Canoa Ranch Historic Site • De Anza Historic Trail • Sonoran Desert Conservation Plan (Was Carolyn Campbell, Coalition for Sonoran Desert Protection, interviewed as a stakeholder?) • Proposed Tumacacori Highlands Wilderness <p><i>Response: 1) Canoa Ranch Historic Site: The section 4(f) section has been updated. The Canoa Ranch is currently only recommended eligible for listing on the NRHP (Appendix C.2), until a determination has been made that this property/site is eligible for listing or receives listing to the NRHP it does not fall under the Section 4(f) umbrella based on it's historical nature. However since it is owned by the county (public) and is actively being used for recreational purposes along with having an established recreation plan for the site it does qualify as a Section 4(f) property. This is detailed in the revised Working Paper.</i></p> <p><i>2) The Juan Bautista de Anza National Historic Trail is not a listed NRHP site nor has it been determined eligible. The National Historic Trail designation was given by the Parks Service not NRHP, additionally there are no recreational areas for this trail within the study area and therefore would not qualify as a Section 4(f) resource. This is detailed in the revised Working Paper.</i></p> <p><i>3) The Sonoran Desert Conservation Plan is discussed in Section 4.2.3.2-Wildlife. Carolyn Campbell was not interviewed as a stakeholder. Data was obtained from their website.</i></p> <p><i>4) The proposed Tumacacori Highlands Wilderness is not located within the study area however mention of it's proximity to the study area is now identified within the section 4(f) discussion.</i></p>		
12	Exhibit 5-1	<p>Exhibit 5-1, Summary of ----- Traffic Volumes: Looks like the column headings for 2030 and 2017 are switched. Does Segment 5 recognize the connection of the EFR?</p> <p><i>Response: The column headings are correct. The reference to the exhibits regarding 2017 and 2030 traffic volume projections was corrected. With respect to segment 5, the East frontage road 2030 traffic volumes were revised to be consistent with the 2030 traffic projections in the Draft Design Concept Report for the I-19 East Frontage Road, Canoa to Continental.</i></p>	A	
		Robert Welch, PE, Town of Sahuarita		
1	General	<p>It is noted that the subject matter and location of the study is the I-19 frontage roads from the I-10/I-19 interchange south to the U.S. – Mexico international border and that the study is purposed on identifying traffic operations and related transportation issues of ADOT's frontage road system. Further, it is intended from this study that ADOT will have a better understanding of what their policy(ies) should be for current and future operations, and what a 10-year program for multi-modal improvements should be.</p> <p><i>Response: This is correct.</i></p>	D	

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2	General	<p>It is noted that this study is "Draft Working Paper No. 1", which is intended to relate available data and information on existing and future traffic conditions. This information will provide the foundational framework for the formulation of needs, deficiencies, and those recommendations for development of policy and improvement programs as indicated in previous item #1.</p> <p><i>Response: This is correct.</i></p>	D
3		<p>The study does not include reference or consideration of the Town's interest for a new interchange south of Pima Mine Road and the development potential of large tracts of vacant land in that area. Further, it does not discuss the interchange proposal by the Tohono O'odham Nation north of Pima Mine Road. Commercial or other development opportunities of these large land tracts may be fostered by consideration of a frontage road system in this area, which is of mutual benefit to the Town and Nation.</p> <p><i>Response: We referenced this information in the report, in Section 2.4 Summary of Completed Traffic Impact Studies. Frontage roads are not currently in this area.</i></p>	
4	General	<p>The study does not cite or relate any data/information from the Mission Peaks Development Proposal.</p> <p><i>Response: It is our understanding that this development plan has been withdrawn.</i></p>	D
5		<p>It is noted that Sahuarita lacks any significant frontage road system that is applicable to the study, however we suggest Exhibit 3.2 and 3.3 be amended to include information particular to State vs. Local owned frontage roads.</p> <p><i>Response: We added Section 3.10 Maintenance of the Frontage Road System:</i></p> <p><i>The maintenance of the frontage roads is currently the responsibility of the Arizona Department of Transportation, Tucson District, with the exception of the following segments:</i></p> <ul style="list-style-type: none"> ▪ <i>The West I-19 Frontage Road between Rio Rico Road and Peck Canyon Road is the responsibility of Santa Cruz County, not ADOT.</i> ▪ <i>A segment of the East Frontage Road, north of the Duval Mine Road TI (ADOT maintains the frontage road to approximately 0.10 mile north of the interchange, and the Town of Sahuarita maintains it further north beyond that point).</i> 	A

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6		<p>The lack of a continuous frontage road system through Sahuarita has the potential to place/detour substantial traffic volume obligations on local Sahuarita streets. It should be considered that the study include an evaluation of alternate transportation corridors to identify the best detour route(s) for traffic from I-19 in the event of closure. The Town has certain limitations to handling traffic on Rancho Sahuarita Boulevard and a weight restricted bridge crossing on Pima Mine Road leading to Nogales Highway.</p> <p><i>Response: The text was revised to reflect these concerns in Section 3.5 Access Management. The text was revised to read:</i></p> <p><i>“Even in areas with a supporting road system, it should be noted that the lack of a continuous frontage road system through Sahuarita has the potential to place/detour substantial traffic volume obligations on local Sahuarita streets. It should be considered that the study include an evaluation of alternate transportation corridors to identify the best detour route(s) for traffic from I-19 in the event of closure. The Town has certain limitations to handling traffic on Rancho Sahuarita Boulevard and a weight restricted bridge crossing on Pima Mine Road leading to Nogales Highway.”</i></p> <p><i>The scope of the study does not include an alternate routes study but we will bring forward these concerns in the development of projects and policies.</i></p>	A

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		<i>W. Dempsey Helms, State Land Department</i>		
1	General	<p>The State Land Department Southern Arizona Office has reviewed the report and has identified approximately 3,000(+/-) acres of State Trust Land along the I-19 Corridor. Some of these parcels may be involved with and/or impacted by the future development of proposed frontage road segments.</p> <p>These State Trust lands are in the following five general locations, from south to north:</p> <ol style="list-style-type: none"> 1. Approximately 8 miles north of Milepost 0 (Nogales), east side 2. Approximately 18 miles north, between Rio-Rico and Tumacacori-Carmen, west side; 3. Between Tubac and Amado, west side; 4. Near the intersection of I-19 with Nogales Highway , in the Town of Sahuarita, east side; and 5. Between Sahuarita and Pima Mine Road, in the Town of Sahuarita, east side <p>Regarding these properties, we offer some preliminary comments at this time. The Southern Arizona Office requests that ADOT coordinate with State Land Department during preliminary planning and design for any widening of the interstate corridor and development of frontage roads in addressing the following:</p> <ul style="list-style-type: none"> ▪ Access / Rights of Way ▪ Archaeological Clearances ▪ Plant Inventories ▪ Identification of any Jurisdictional Washes which may require 404 permitting ▪ Impacts from construction of culverts or other drainage structures. ▪ Land use considerations related to Traffic Interchanges. <p><i>Response: We have added this information and comments to Section 4.2.1 Land Jurisdiction and Ownership and Section 4.2.11 Summary of Environmental Opportunities and Constraints</i></p>	A	